

# APPENDIX A

# 2023

## December 16, 2023 – Pres. Trump, Durham, NH Campaign Rally

“... 15, 16, million people [let] into our country. . . .  
They’re poisoning the blood of our country.”



## February 28, 2024 – Sec. Noem, X



Kristi Noem  
@KristiNoem

Venezuela didn’t send us their best. They emptied their prisons and sent criminals to America.

Deportations need to start on DAY ONE of @realDonaldTrump’s term.

## March 14, 2024 – Sec. Noem, X



Kristi Noem  
@KristiNoem

At least 300,000 illegal immigrants from Venezuela have been encountered at the border. Remember, Venezuela emptied their prisons and told them to come to America.

## March 16, 2024 – Pres. Trump, Dayton, OH Campaign Rally

“I don’t know if you call them people. In some cases they’re not people, in my opinion, but I’m not allowed to say that[.]”



# 2024

## February 26, 2024 – Sec. Noem, X



Kristi Noem  
@KristiNoem

Nations like Venezuela are emptying their prisons of dangerous criminals to send them to America. They are happy to let America’s open border be the solution to their problem.

## March 6, 2024 – Sec. Noem, X



Kristi Noem  
@KristiNoem

Countries like Venezuela are emptying their prisons, their mental institutions, and sending them to America.

The White House is facilitating this invasion. They’re doing it on purpose. Joe Biden could stop it — but he hasn’t.



## April 6, 2024 – Pres. Trump, Campaign Fundraiser

“... Why can’t we allow people to come in from nice countries[?]”

“Nice countries, you know like Denmark, Switzerland? Do we have any people coming in from Denmark? How about Switzerland? How about Norway?”

“These are people coming in from prisons and jails. They’re coming in from just unbelievable places and countries, countries that are a disaster.”

**2024**

### September 10, 2024 – Pres. Trump, Presidential Debate

“[The Biden administration] allowed people to come in, drug dealers, to come into our country, and they’re now in the United States. And told by their countries like Venezuela don’t ever come back or we’re going to kill you. . . . There’s never been anything done like this at all. They’ve destroyed the fabric of our country. Millions of people let in.”



### October 27, 2024 – Pres. Trump, New York, NY Campaign Rally

“We’re not going to have a country any longer. . . . The United States is now an occupied country, but it will soon be an occupied country no longer. . . . November 5th, 2024 . . . will be Liberation Day in America. . . . I will rescue every city and town that has been invaded and conquered[.]”



### December 9, 2024 – Sec. Noem, Instagram

**kristinoem** Every illegal immigrant broke the law as their first action in our country. And nations like Venezuela are using our open border to solve their own crime and mental health crises.

When @realDonaldTrump takes office, we will immediately address this issue and deport illegal immigrant criminals.

9w

Demonstrative of Exhibits Listed in Dkt. 59-1

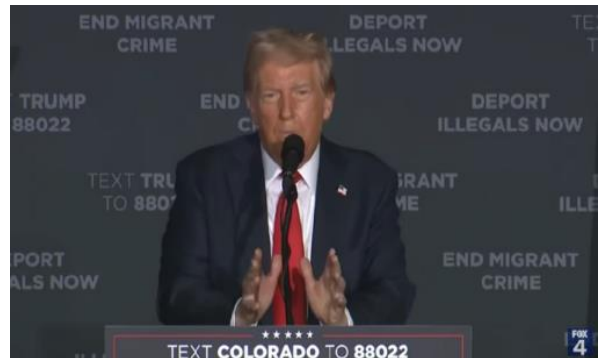
### June 9, 2024 – Pres. Trump, Las Vegas, NV Campaign Rally

“[W]e’re taking in people that are a disaster for our country. So it’s all happening at our border. . . . And we’re not going to let it happen, we’re not going to let them ruin our country, we’re not going to let them destroy our country. . . . The whole country is being turned into an absolute dumping ground[.]”



### October 11, 2024 – Pres. Trump, Aurora, CO Campaign Rally

“Every day, Americans . . . are living in fear all because Kamala Harris decided to empty the slums and prison cells of Caracas [Venezuela] and many other places . . . . And we have to live with these animals, but we’re not going to live with them for long, you watch.”



### November 5, 2024 – Presidential Election

### December 8, 2024 – Pres. Trump, “Meet the Press”

“[I]n Venezuela their prisons are . . . at the lowest point in terms of emptiness that they’ve ever been[.] They’re taking their people out of those prisons by the thousands[.]”



# 2025

## January 15, 2025 – Sec. Noem Confirmation Hearing

“[T]his extension [of TPS] of over 600,000 Venezuelans . . . is alarming when you look at what we’ve seen in different states, including Colorado with gangs doing damage and harming the individuals and the people that live there.”



## January 28, 2025 – Sec. Noem Vacates Sec. Mayorkas’s January 17 Extension



7 AM in NYC. Getting the dirt bags off the streets.



## February 1, 2025 – Sec. Noem Terminates Venezuela’s 2023 TPS Designation

## February 3, 2025 – Vacatur Notice Published in Federal Register

## February 5, 2025 – Termination Notice Published in Federal Register

January 17, 2025 –

## Fmr. Sec. Mayorkas Issues DHS Notice: Venezuela’s 2023 TPS Designation Is Extended

## January 20, 2025 – Pres. Trump Inauguration

## January 22, 2025 – Pres. Trump, Fox News

“[G]ang members, right off the streets of the toughest cities in the world, are being brought to the [U.S.]”

## January 25, 2025 – Sec. Noem Sworn In

## January 29, 2025 – Sec. Noem, “Fox and Friends”

“[T]hey were going to extend this protection to people that are in temporary protected status, which meant they were going to be able to stay here and violate our laws for another 18 months and we stopped that. Today we signed an executive order within [DHS] in a direction that we were not going to follow through on what he [Fmr. Sec. Mayorkas] did to tie our hands, that we are going to follow the process, evaluate all of these individuals that are in our country, including the Venezuelans that are here and members of TdA. Listen, . . . the people of this country want these dirt bags out.”



## February 2, 2025 – Sec. Noem, “Meet the Press”

“[T]he TPP [sic] program has been abused, and it doesn’t have integrity right now. And folks from Venezuela that have come into this country are members of TdA. And remember, Venezuela purposely emptied out their prisons, emptied out their mental health facilities and sent them to the United States of America. So we are ending that extension of that program[.]”

